

**U.S. ENVIRONMENTAL PROTECTION AGENCY (EPA)  
30-DAY NOTIFICATION FORM  
PURSUANT TO 40 CFR PART 60 SUBPARTS AAA AND QQQQ  
2015 STANDARDS OF PERFORMANCE FOR NEW RESIDENTIAL WOOD HEATERS, NEW  
RESIDENTIAL HYDRONIC HEATERS AND FORCED-AIR FURNACES**

**Disclaimer:** The statutory provisions and the EPA regulations described in this document contain legally binding requirements. This document is not a substitute for those provisions or regulations, nor is it a regulation itself. In the event of a discrepancy, please refer to 40 CFR PART 60 Subparts AAA AND QQQQ, Sections 60.533 and 60.5475. This document may be revised periodically without public notice. If you have additional questions, please contact Rafael Sanchez at 202-564-7028 or via email at [sanchez.rafael@epa.gov](mailto:sanchez.rafael@epa.gov).

- ▶ The manufacturer of an affected wood/pellet heater/central heater model line must notify the Administrator of the date that certification testing is scheduled to begin by email to [WoodHeaterReports@epa.gov](mailto:WoodHeaterReports@epa.gov).
- ▶ This notice must be received by the EPA at least 30 days before the start of testing.

**GENERAL INFORMATION**

**Manufacturer's Name:** Innovative Hearth Products, LLC

<b>Appliance Type (Circle One):</b>	Adjustable Burn Rate Wood Heater	Pellet Stove	Single Burn Rate Heater	Hydronic Heater	Forced Air Furnace	Other:
<b>Hydronic Heater Type (Circle One):</b>	Traditional	Full Storage	Partial Storage	Indoor/Outdoor	Other: N/A	
<b>Forced-Air Furnace Type (Circle One):</b>	Small (less than 65,000 BTU/hr heat output)		Large (greater than 65,000 BTU/hr heat output)		Other:	
<b>Fuel Type:</b>	Crib	Pellet	Cordwood	Other:		

**Model Name and Number:** Ladera-D, WRT3920WS-B

**Catalyst:** Yes \_\_\_\_\_ No ☒ \_\_\_\_\_

**Mailing Address:** 1502 14<sup>th</sup> St NW

**Street Address:** 1502 14<sup>th</sup> St NW

<b>City:</b> Auburn	<b>State:</b> WA	<b>ZIP Code:</b> 98001
<b>Phone:</b> 253-735-1100	<b>Email:</b> Matthew.Romanow@ihp.us.com	<b>Web Site:</b> www.ihp.us.com

**Address of Manufacturing Facility:**

1502 14<sup>th</sup> St NW

<b>City:</b> Auburn	<b>State:</b> WA	<b>ZIP Code:</b> 98001
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**EPA APPROVED TEST LABORATORY**

**Name and Title of Authorized Representative:** Sebastian Button

**Company:** PFS-TECO

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<b>Phone:</b> 503-650-0088	<b>Email:</b> Sebastian.button@pfsteco.com	<b>Website:</b> www.pfsteco.com
<b>City:</b> Clackamas	<b>State:</b> OR	<b>ZIP Code:</b> 97015
<b>EPA APPROVED THIRD-PARTY CERTIFIER</b>		
<b>Name and Title of Authorized Representative:</b> John Steinert, General Manager		
<b>Company:</b> PFS-TECO		
<b>Phone:</b> 503-650-0088	<b>E-mail:</b> john.steinert@pfsteco.com	<b>Website:</b> www.pfsteco.com
<b>City:</b> Clackamas	<b>State:</b> OR	<b>ZIP Code:</b> 97015
<b>COMPLIANCE TEST INFORMATION</b>		
<b>Test Method(s):</b> ASTM E3053 (ALT-125) / ASTM E2515		
<b>Date(s) of Proposed Test:</b> Week of September 13, 2021		
<b>Testing Location:</b>  PFS TECO 11785 SE Highway 212 Suite 305 Clackamas, OR 97015		

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**Matthew Romanow**

**Print Name and Title of Authorized Official**



**Signature**

**July 29, 2021**

**Date**

**Remarks:**



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
RESEARCH TRIANGLE PARK, NC 27711

FEB 28 2018

Mr. Justin White  
Hearthstone QHPP, Inc.  
#17 Stafford Ave.  
Morrisville, VT 05661

OFFICE OF  
AIR QUALITY PLANNING  
AND STANDARDS

Dear Mr. White,

I am writing in response to your letter dated January 12, 2018, regarding wood heaters manufactured by Hearthstone QHPP, Inc. (Hearthstone). This response, dated February 28, 2018, supercedes our previous response (dated February 26, 2018) to correct an inaccuracy regarding required changes to ASTM E3053-17.

You are requesting to use an alternative test method, using cord wood, as referenced in section 60.532(c) of 40 CFR part 60, Subpart AAA, Standards of Performance for New Residential Wood Heaters (Subpart AAA) to meet the 2020 cord wood alternative compliance option. The 2020 cord wood alternative compliance option states that each affected wood heater manufactured or sold at retail for use in the United States on or after May 15, 2020, must not discharge into the atmosphere any gases that contain particulate matter in excess of 2.5 g/hr. Compliance must be determined by a cord wood test method approved by the Administrator along with the procedures in 40 CFR 60.534. You have requested approval to use the procedures and specifications found in ASTM Method E3053-17, a cord wood test method titled, "Standard Test Method for Determining Particulate Matter Emissions from Wood Heaters using Cordwood Test Fuel," in conjunction with ASTM E2515-11 and Canadian Standards Administration (CSA) Method CSA-B415.1-10, which are specified in 40 CFR 60.534.

We understand that Hearthstone is also requesting that the alternative method proposed above be approved to apply broadly to all wood heaters manufactured by Hearthstone meeting the requirements of Subpart AAA, from the approval date of this request until such time that Subpart AAA is revised or replaced to require a different cord wood certification method, providing all requirements of section 60.533 of Subpart AAA are met.

With the caveats set forth below, we approve your alternative test method request for certifying wood heaters using ASTM E3053-17 in conjunction with section 60.534 of Subpart AAA to meet the 2020 cord wood compliance option until such time that Subpart AAA is revised or replaced to require a different cord wood certification method. We also approve application of this alternative method to all wood heaters manufactured by Hearthstone meeting the requirements of Subpart AAA.

As required in Subpart AAA, section 60.354(d), you or your approved test laboratory must also measure the first hour of particulate matter emissions for each test run using a separate filter in one of the two parallel sampling trains. These results must be reported separately and also included in the total particulate matter emissions per run. Also, as required by Subpart AAA, section 60.534(e), you must have your approved laboratory measure the efficiency, heat output, and carbon monoxide emissions of the tested wood heater using CSA-B415.1-10. For measurement of particulate matter emission concentrations, ASTM 2515-11 must be used.

The following change to ASTM E3053-17 must be followed:

1. Coal bed conditions prior to loading test fuel. The coal bed shall be a level plane without valleys or ridges for all test runs in the high, low, and medium burn rate categories.

The following changes to ASTM E2515-11 must be followed:

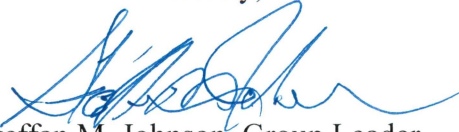
1. The filter temperature must be maintained between 80 and 90 degrees F during testing.
2. Filters must be weighed in pairs to reduce weighing error propagation; see ASTM 2515-11, Section 10.2.1 Analytical Procedure.
3. Sample filters must be Pall TX-40 or equivalent Teflon-coated glass fiber, and of 47 mm, 90 mm, 100 mm, or 110 mm in diameter.
4. Only one point is allowed outside the +/- 10 percent proportionality range per test run.

A copy of this letter must be included in each certification test report where this alternative test method is utilized.

It is reasonable that this alternative test method approval be broadly applicable to all wood heaters subject to the requirements of 40 CFR part 60, Subpart AAA. For this reason, we will post this letter as ALT-125 on our website at <http://www3.epa.gov/ttn/emc/approalt.html> for use by other interested parties. As noted earlier in this letter, this alternative method approval is valid until such time that Subpart AAA is revised or replaced to require a different cord wood certification method, and at such time, this alternative will be reconsidered and possibly withdrawn.

If you have additional questions regarding this approval, please contact Michael Toney of my staff at 919-541-5247 or [toney.mike@epa.gov](mailto:toney.mike@epa.gov).

Sincerely,



Steffan M. Johnson, Group Leader  
Measurement Technology Group

cc: Amanda Aldridge, EPA/OAQPS/OID  
Adam Baumgart-Getz, EPA/OAQPS/OID  
Rafael Sanchez, EPA/OECA  
Michael Toney, EPA/OAQPS/AQAD